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*Attorneys for Defendant
World Class Ink Supply, Inc*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CANON INC.,)	
)	
Plaintiff,)	Civil Action No. 18-2832 (RBK/AMD)
)	AMENDED
vs.)	STIPULATION, CONSENT
)	JUDGMENT, AND PERMANENT
WORLD CLASS INK SUPPLY, INC.,)	INJUNCTION
)	
Defendant.)	

This Stipulation, Consent Judgment, and Permanent Injunction ("Consent Judgment") is entered into by and between Plaintiff Canon Inc. and Defendant World Class Ink Supply, Inc., subject to approval by the Court.

WHEREAS, Plaintiff brought this suit against Defendant for infringement of Plaintiff's U.S. Patent Nos. 9,746,826 (the "'826 patent"); 9,836,021 (the "'021 patent"); 9,841,727 (the "'727 patent"); 9,841,728 (the "'728 patent"); 9,841,729 (the "'729 patent"); 9,857,764 (the "'764 patent"); 9,857,765 (the "'765 patent"); 9,869,960 (the "'960 patent"); and 9,874,846 (the "'846 patent") (collectively, "Asserted Patents") based on Defendant's unauthorized importation,

sale, and/or offer for sale of certain toner cartridges, including toner cartridges having the following product designation: PTCE505AND ("Named Products");

WHEREAS, Defendant wishes to conclude this litigation at Plaintiff's initial pleading stage without contesting infringement, validity, or enforceability of any claims of the Asserted Patents; and

WHEREAS, Plaintiff and Defendant, through their respective counsel, hereby agree to entry of this Consent Judgment;

NOW, THEREFORE, IT IS HEREBY STIPULATED, ORDERED, AND ADJUDGED:

1. This is an action for patent infringement under the patent laws of the United States, Title 35 of the United States Code.
2. This Court has jurisdiction over Defendant and the subject matter of this action under 28 U.S.C §§ 1331 and 1338(a). Venue is proper in this Court pursuant to 28 U.S.C § 1400(b).
3. Plaintiff is the owner of all right, title, and interest in and to the Asserted Patents.
4. Defendant does not contest, solely for purposes of this litigation, that all of claims 1-4, 6, 7, and 9 of the '826 patent, claims 1, 2, 4, 5, and 7 of the '021 patent, claims 1, 2, 4-7, 9-12, 15-17, 19-22, 24, 26, and 27 of the '727 patent, claims 1, 2, 4-7, 9-12, 15-17, 19-22, 24, and 26-28 of the '728 patent, claims 1-3, 6, 8-11, 14, 16-21, 24, and 26 of the '729 patent, claims 7-9 of the '764 patent, claims 1, 3, 4, 6, 13, 16, 17, and 19 of the '765 patent, claims 1-7 of the '960 patent, and claims 1-3 of the '846 patent are valid, enforceable, and infringed by the Named Products.

5. Defendant has imported, sold, and/or offered for sale in the United States toner cartridges accused of infringement in this action, including but not limited to the Named Products.

6. Effective as of the date this Consent Judgment is entered by the Court, Defendant and its subsidiaries, affiliates, officers, directors, agents, servants, employees, successors, and assigns, and all other persons and organizations in active concert or participation with any of the foregoing, are hereby permanently enjoined and restrained from engaging in any of the following activities:

(a) making, using, selling, or offering for sale in the United States, or importing into the United States, during the remaining term of the Asserted Patents, (i) any of the Named Products, (ii) any other toner cartridge which has a coupling member of the types depicted in attached Appendices A-L, and (iii) any other toner cartridge that is not more than colorably different from either (i) or (ii) and which infringes at least one valid and enforceable claim of at least one Asserted Patent;

(b) otherwise directly infringing, contributorily infringing, or inducing infringement of any of the claims of the Asserted Patents with respect to (i) any of the Named Products, (ii) any other toner cartridge which has a coupling member of the types depicted in attached Appendices A-L, and (iii) any other toner cartridge that is not more than colorably different from either (i) or (ii) and which infringes at least one valid and enforceable claim of at least one Asserted Patent; and

(c) assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities referred to in subparagraphs (a) and (b) above.

7. If any claim of any of the Asserted Patents is found or adjudicated invalid or unenforceable by a court of competent jurisdiction, in a final decision, no longer subject to appeal, this Consent Judgement shall become null, void, and unenforceable as to any such invalid or unenforceable claim(s).

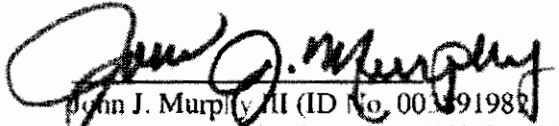
8. Defendant and Plaintiff shall bear their own costs and attorney fees.

9. This Consent Judgment constitutes a final judgment concerning the subject matter of this action between Plaintiff and Defendant.

10. Defendant and Plaintiff waive any right to appeal from this Consent Judgment.

11. Upon entry of this Consent Judgment, this action is dismissed, with prejudice; provided, however, that this Court shall retain jurisdiction to enforce the terms and provisions of this Consent Judgment.

STIPULATED AND CONSENTED TO:



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World Class Ink Supply, Inc.*

SO ORDERED:

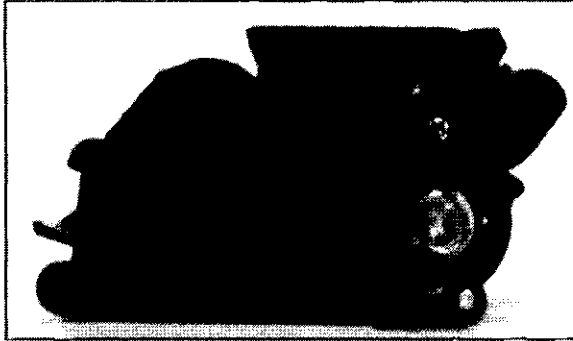
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June 4, 2018

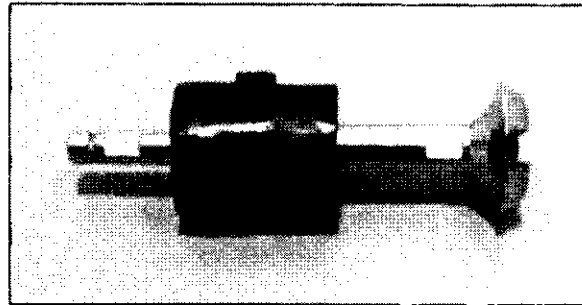
A handwritten signature in black ink, appearing to read "Robert B. Kugler", followed by a horizontal line.

Robert B. Kugler
United States District Judge

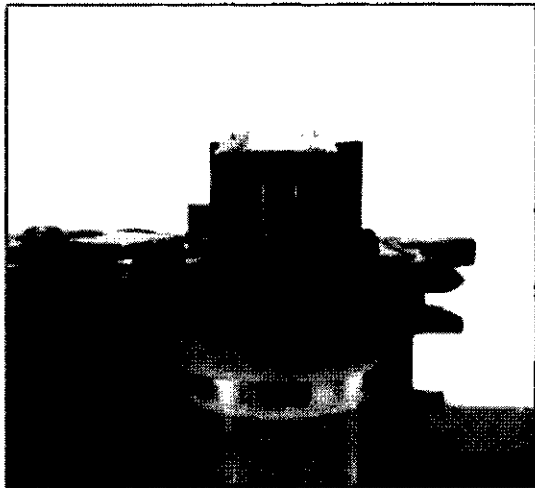
APPENDIX A



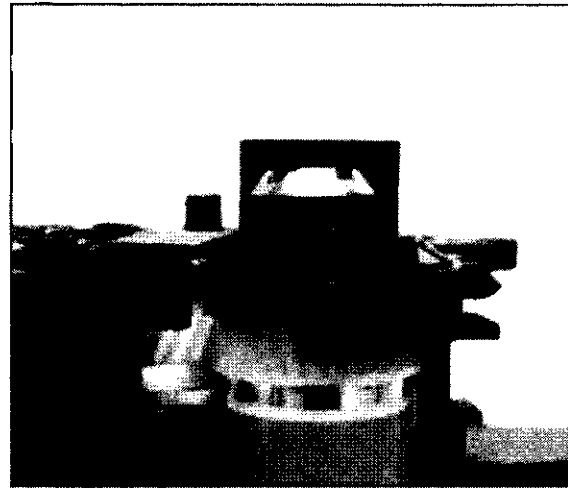
Coupling member side of cartridge



Coupling member removed from cartridge

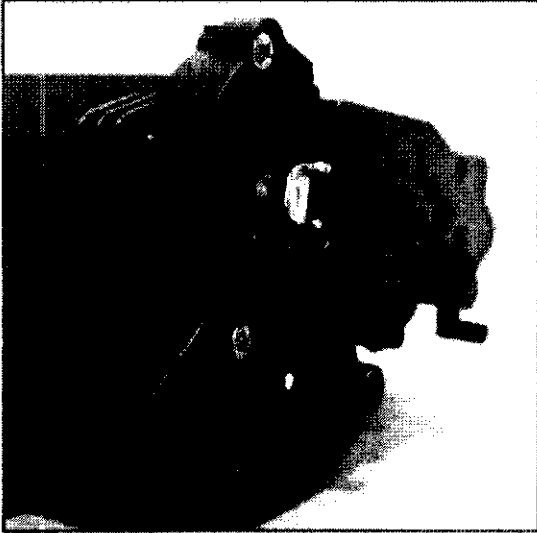


First position of coupling member

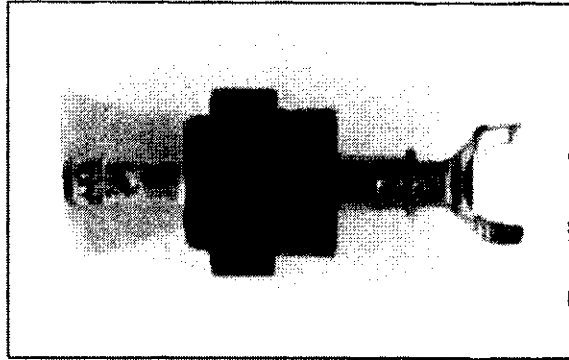


Second position of coupling member

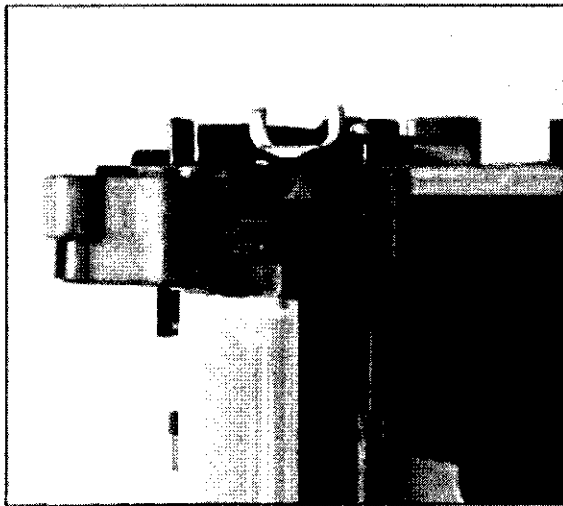
APPENDIX B



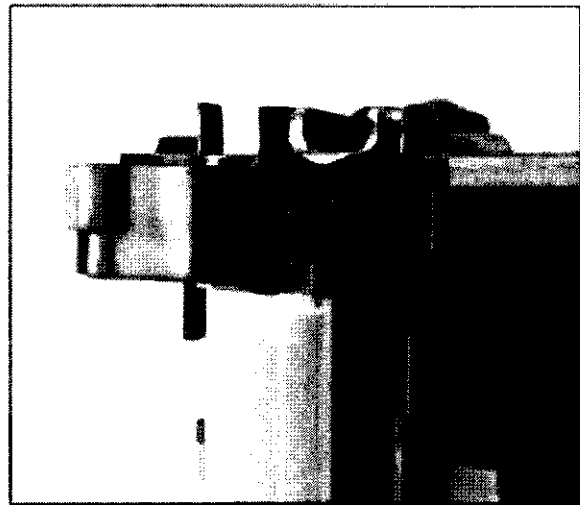
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member

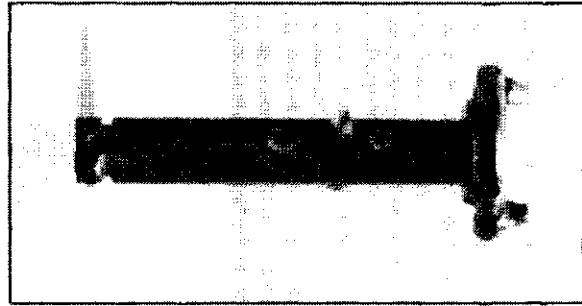


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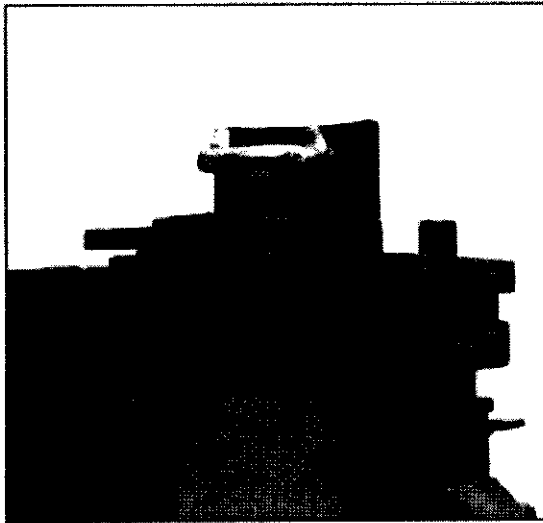
APPENDIX C



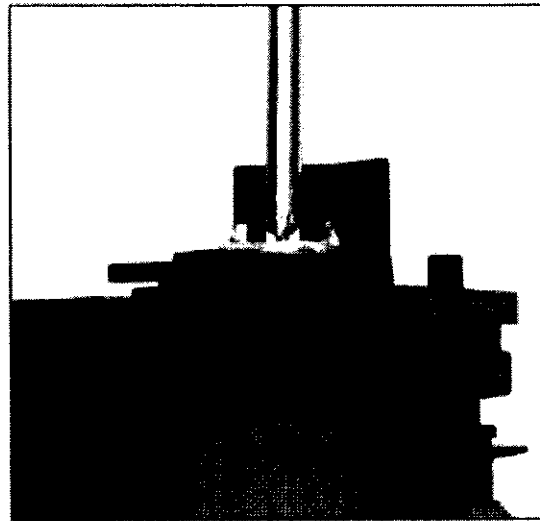
Coupling member side of cartridge



Coupling member removed from cartridge

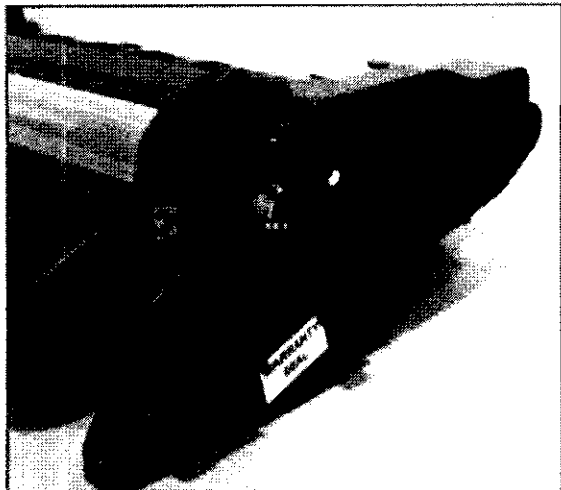


First position of coupling member

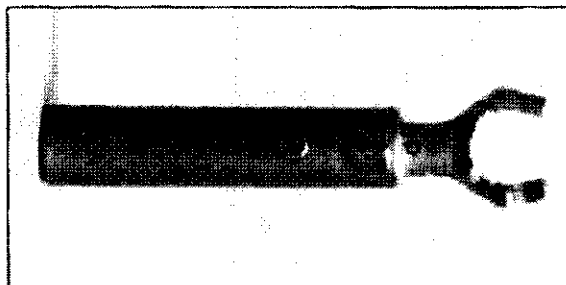


Second position of coupling member

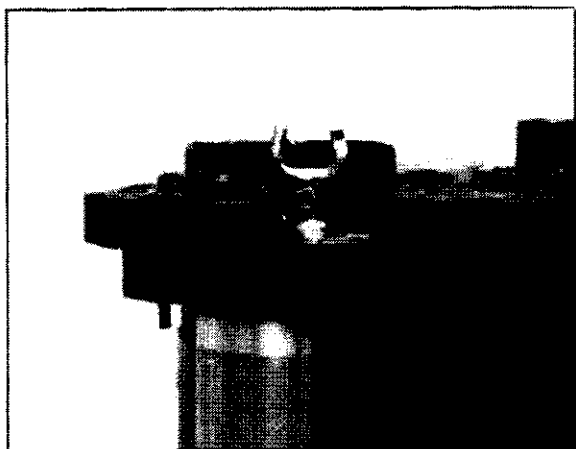
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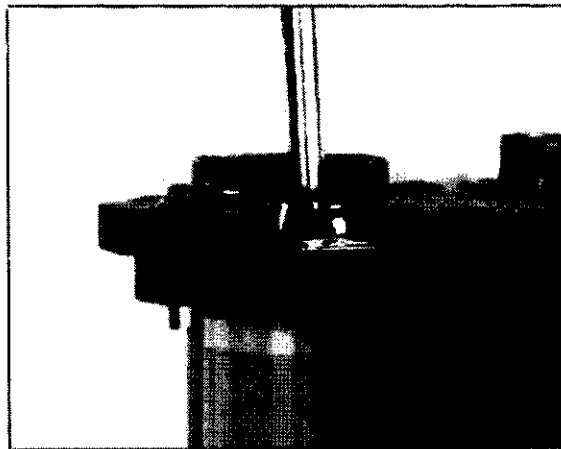
Coupling member side of cartridge



Coupling member removed from cartridge

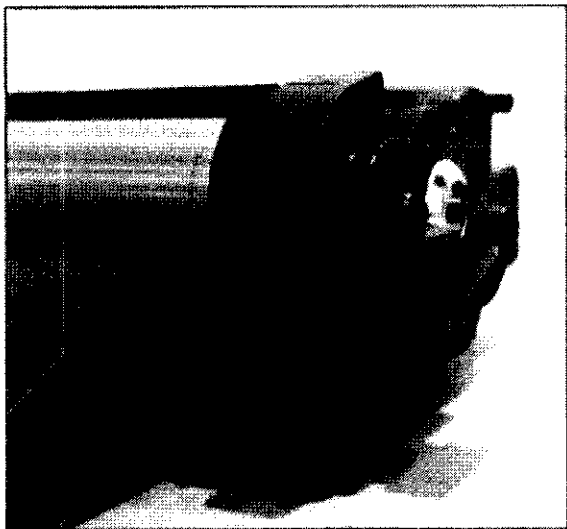


First position of coupling member

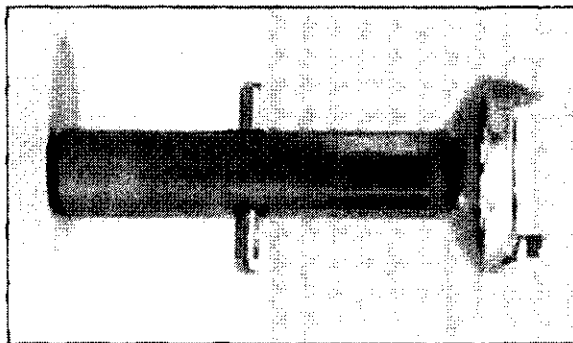


Second position of coupling member

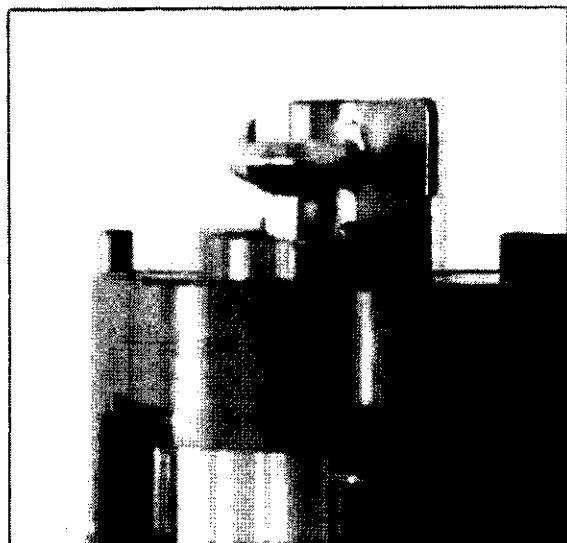
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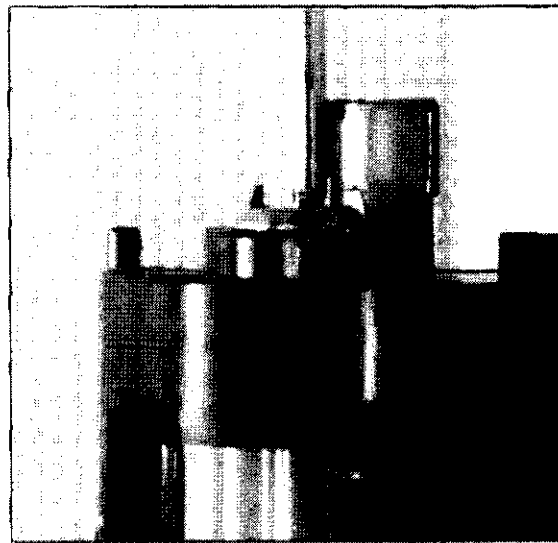
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member

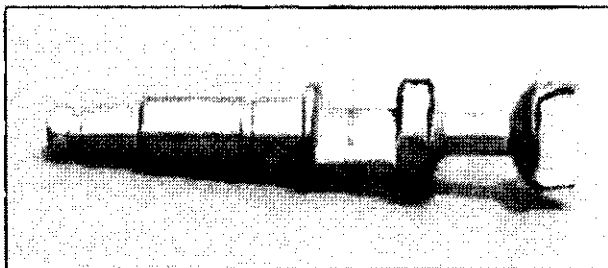


Second position of coupling member

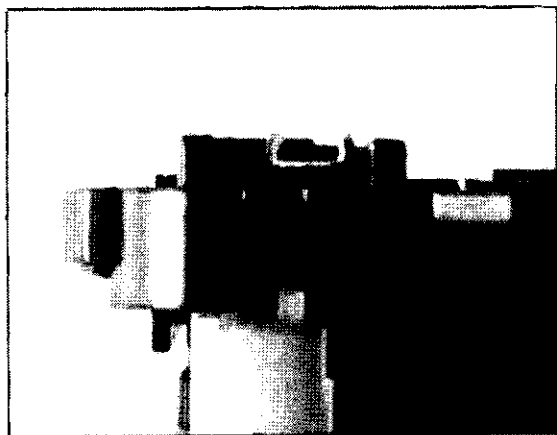
APPENDIX F



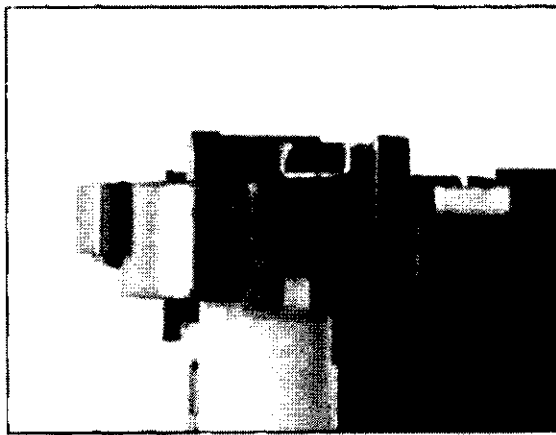
Coupling member side of cartridge



Coupling member removed from cartridge

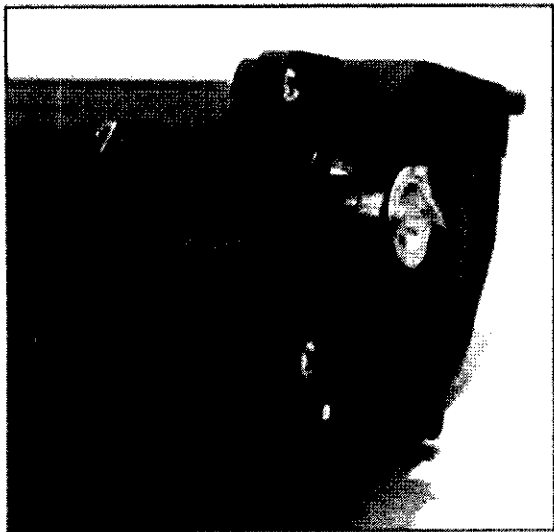


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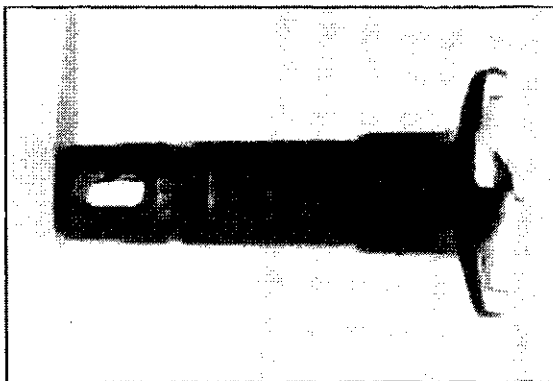


Second position of coupling member

APPENDIX G



Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member

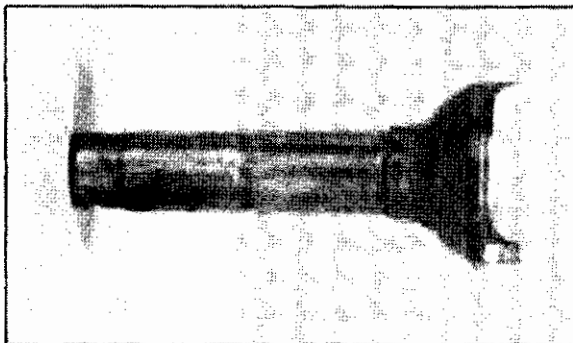


Second position of coupling member

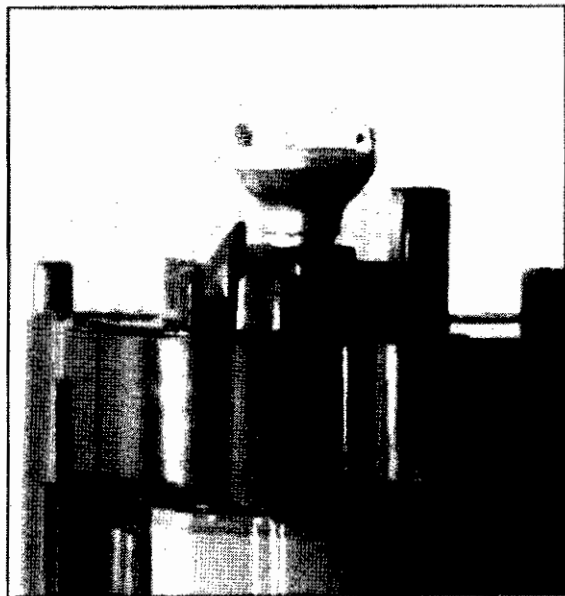
APPENDIX H



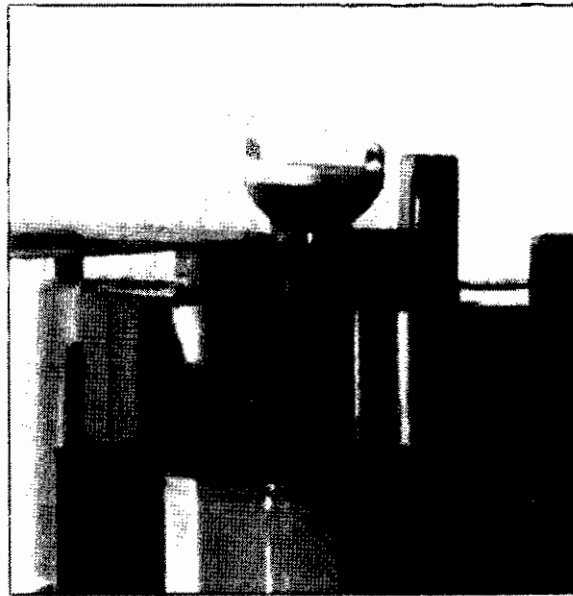
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member

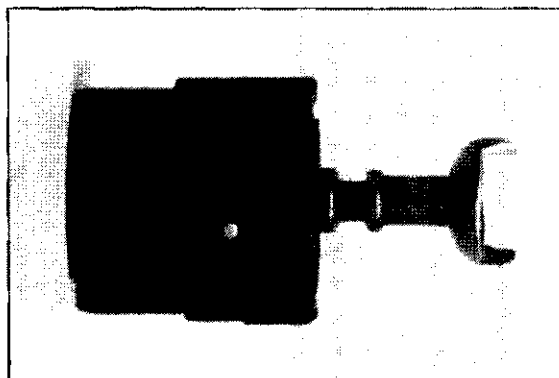


Second position of coupling member

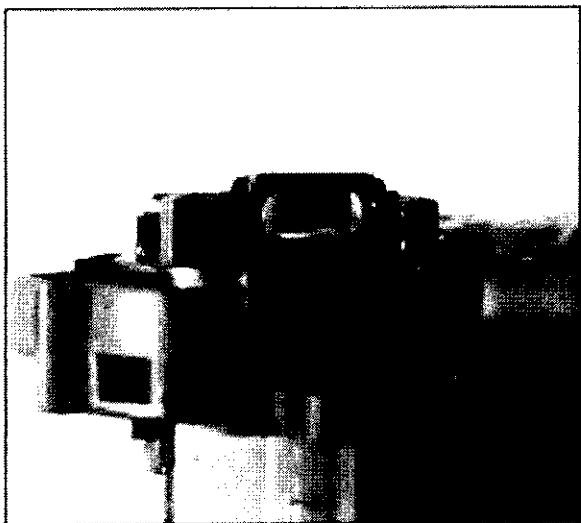
APPENDIX I



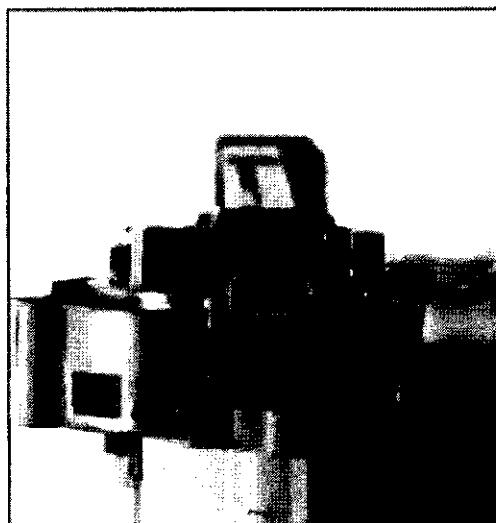
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member



Second position of coupling member

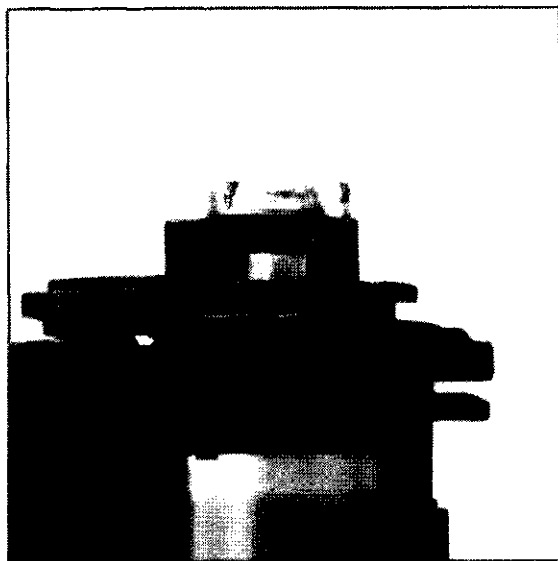
APPENDIX J



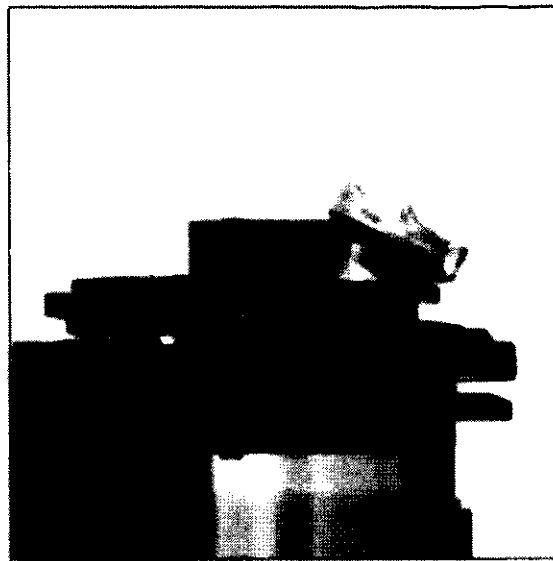
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member



Second position of coupling member

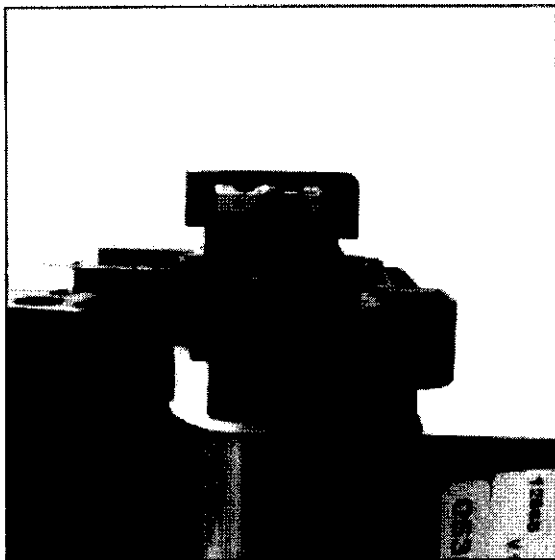
APPENDIX K



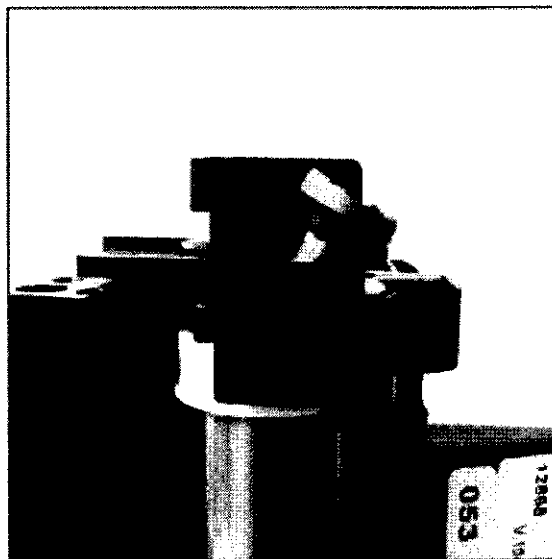
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member

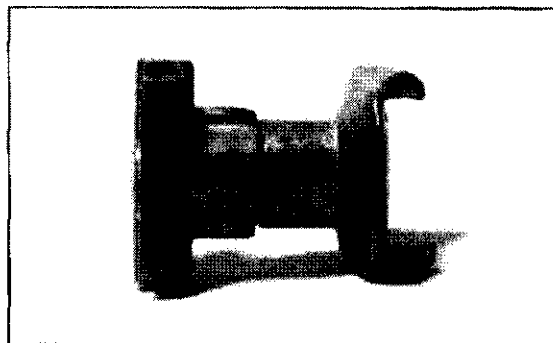


Second position of coupling member

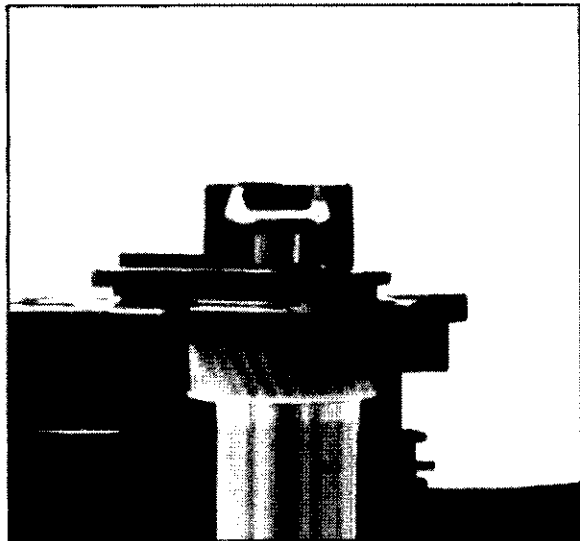
APPENDIX L



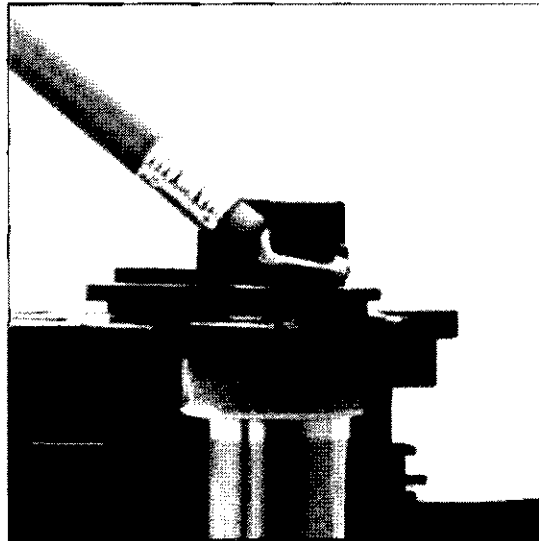
Coupling member side of cartridge



Coupling member removed from cartridge



First position of coupling member



Second position of coupling member